

Linda Estes Carrington - 4/8/10

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1           IN THE UNITED STATES DISTRICT COURT  
2           FOR THE EASTERN DISTRICT OF TEXAS  
3           MARSHALL DIVISION  
4  
5           PATTY BEALL, MATTHEW        )  
6           MAXWELL, TALINA McELHANY,  )  
7           AND KELLY HAMPTON,        )  
8           individually and on behalf  )  
9           of all other similarly        )  
10           situated,                    )  
11           Plaintiffs,                )  
12                                        ) No. 2:08-cv-422  
13           VS                        )  
14                                        )  
15           TYLER TECHNOLOGIES, INC.  )  
16           AND EDP ENTERPRISES, INC., )  
17           Defendants.                )  
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13           ORAL DEPOSITION OF  
14           LINDA ESTES CARRINGTON

15           4/8/10

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17           ORAL DEPOSITION OF LINDA ESTES CARRINGTON,  
18           produced as a witness at the instance of the DEFENDANTS,  
19           and duly sworn, was taken in the above-styled and  
20           numbered cause on the 8th day of April, 2010, from  
21           9:18 a.m. to 12:23 p.m., before TINA TERRELL BURNEY, CSR  
22           in and for the State of Texas, reported by machine  
23           shorthand, at the offices of MORGAN, LEWIS & BOCKIUS LLP,  
24           1717 Main Street, Suite 3200, Dallas, Texas 75601,  
25           pursuant to the Federal Rules of Civil Procedure.

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1 A. Never.

2 Q. Did you fill out everything on this time sheet,  
3 or did anyone else complete part of the time sheet?

4 A. On this particular one?

5 Q. Well, I'm not -- I've got this particular one  
6 just so you have it as an example, but my question is  
7 intended to be more general, so let me phrase it as such.  
8 Look at this as an example, if you want, but my question  
9 is: Were there portions of the time sheet that someone  
10 other than yourself completed on a regular basis?

11 A. On a regular basis?

12 Q. Yes.

13 A. Not on a regular basis, no.

14 Q. Were there portions of the time sheets that  
15 someone else completed on something other than a regular  
16 basis?

17 A. Yes, as I previously testified to.

18 Q. What portions are you referring to or were you  
19 referring to in your previous testimony?

20 A. It would be the actual time and where it went.

21 Q. Okay. So let's look at this sheet again by way  
22 of example. How do you pronounce this (indicating)  
23 county?

24 A. Nueces.

25 Q. Nueces County. So this refers to a project --

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1 an implementation at Nueces County I take it.

2 A. It's a fit analysis.

3 Q. What's a fit analysis?

4 A. Where we go in, and it's prior to  
5 implementation.

6 Q. What do you do in a fit analysis?

7 A. That's what Collin County did with us that  
8 week.

9 Q. That introductory --

10 A. It's an introductory, and you're bringing in  
11 all the key users, you know, not every clerk. You're  
12 just bringing in what are considered superusers.

13 Q. And you have this introductory session for  
14 them?

15 A. You try, yeah. And the project manager is --  
16 we're all benefiting from it, every aspect of the team.

17 Q. But this is something you said you didn't  
18 specifically attend as an implementation specialist?

19 A. Implementation people do conduct fit analysis.

20 Q. Did you conduct this fit analysis at Nueces  
21 County?

22 A. Yes, I did with the project manager as the  
23 lead.

24 Q. What did you do, what was your role in  
25 conducting the fit analysis?

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1 A. My role is to drive the computer. I'm the  
2 driver, and I go through the system, and what you're  
3 doing is you're making the superusers aware of the  
4 procedure, the path that Odyssey uses, because the way  
5 that they have been working with their old system may not  
6 be the way they're going to be able to work with Odyssey.  
7 They may have to change some of the procedures.

8 In other words, they begin the same, and  
9 the result will be the same, but in between we may need  
10 to help them.

11 Q. How they get there is going to be different?

12 A. Right.

13 Q. And that's as a result of the differences in  
14 the software?

15 A. You're just doing a fit analysis to figure out  
16 how their organization is set up --

17 Q. Does the --

18 A. -- and where the rights and roles are.

19 Q. So the fit analysis involves some input from  
20 the superusers as well?

21 A. That's what you're doing.

22 Q. They are giving you information?

23 A. They are giving you information.

24 Q. Okay. And you consider this discrete from the  
25 implementation process itself?

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1 A. It's part of the implementation process.

2 Q. So it's part of something that you did as an  
3 implementation specialist?

4 A. Yes.

5 Q. And in this case, you did it with the project  
6 manager?

7 A. Yes.

8 Q. And that would be typical?

9 A. Yes.

10 Q. It would be you and the project manager?

11 A. And a business analyst.

12 Q. Okay. Would this be like in a classroom  
13 setting?

14 A. It would be in a room like this.

15 Q. A conference room?

16 A. A conference room.

17 Q. Each person would have their own terminal I  
18 take it.

19 A. No, it would be broadcast. It would be  
20 reflected on a screen.

21 Q. So during the fit analysis, you would get  
22 information from the customer?

23 A. The project manager -- I mean, you know, you  
24 ask questions and everything, and the business analyst  
25 has a big part of the program. My role as implementation

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1 person is mainly to be driving the computer.

2 Q. What does that mean, driving the computer?

3 A. Well, going through the different aspects of  
4 the software.

5 Q. So that was part of the training that you  
6 conducted?

7 A. During a fit analysis, you aren't really  
8 training. You're just -- you are just exposing them to  
9 the system.

10 Q. But you would speak during these fit analysis?

11 A. Oh, yes.

12 Q. Would there be a PowerPoint or anything like  
13 that?

14 A. No.

15 Q. Would you have some -- how would you know what  
16 your role was to be? Would there be like a schedule of  
17 who was doing what at particular times during the fit  
18 analysis?

19 A. Depending on how the project manager wanted it  
20 to go.

21 Q. And that would vary from project to project?

22 A. Uh-huh.

23 Q. Is that yes?

24 A. Yes, sir, I'm sorry.

25 Q. Depending on the particular project manager's

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1 processes they were doing by hand and not by automation.

2 Q. I see. So let me get a better sense of what a

3 fit analysis looks like. It's in a conference room.

4 It's you, the business analyst, and the project manager,

5 and is it just a free-for-all discussion --

6 A. No.

7 Q. -- between them, or is there like a program,

8 how does it work?

9 A. I'm sitting at that (indicating) end, and I'm  
10 introducing Odyssey. You know, here it is. This is Step  
11 Number 1. And the business analyst mainly is asking a  
12 ton of questions and gathering all that information that  
13 you're asking about.

14 Q. What information?

15 A. That you were asking about just a minute ago.

16 Q. About their current system?

17 A. Right, and about their policies and procedures.

18 Q. And when you say -- I want to take this at a  
19 real basic level so I understand it. When you're saying  
20 you're introducing the system, what are you doing?

21 You're talking about Odyssey? You're showing them  
22 Odyssey?

23 A. I'm showing them how Odyssey works.

24 Q. How?

25 A. In a very basic way.

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1 Q. But how, through a computer?

2 A. Yeah, with the software on the machine, on the  
3 computer.

4 Q. So are they looking at your machine, or are  
5 they looking at a screen?

6 A. They are looking at a projection on the wall.

7 Q. So you're walking through during this fit  
8 analysis just generally how the software works?

9 A. On their day-to-day process. You know, like if  
10 you've got the probate clerks in there, you're showing  
11 them from beginning to end how the basic process would  
12 work, is going to work when they get Odyssey into their  
13 offices.

14 Q. So at this point during the fit analysis, you  
15 haven't incorporated any information or any data from  
16 their old system into the program, correct?

17 A. No.

18 Q. No, that's not correct?

19 A. I'm agreeing with you. There has been no data  
20 entered into their system at this time.

21 Q. What is the project manager's role during the  
22 fit analysis?

23 A. The project manager is leading the whole thing  
24 and asking questions too and working in tandem with the  
25 business analyst, because at that time the project

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1 manager is probably -- I'm assuming, I'm making an  
2 assumption -- is trying to figure out how long this  
3 project is going to take. This is a good time to figure  
4 all that out but...

5 Q. All right. So during one of these fit  
6 analysis, how do you know when you're supposed to have a  
7 particular role? When do you know that you're supposed  
8 to start walking through the presentation on the screen  
9 to show how Odyssey works?

10 A. Well, it's informal, and the project manager  
11 will be directing.

12 Q. So the project manager would say, okay, let's  
13 talk about this?

14 A. Right, exactly.

15 Q. Let's talk about appeals?

16 A. Right, and ask the business analyst, do you  
17 have any other questions? Is there anything else we need  
18 to cover that you don't have covered?

19 Q. And you would ask questions as well during the  
20 fit analysis?

21 A. But my questions aren't as important as the  
22 business analyst's and the project manager's during this  
23 forum.

24 Q. What kind of questions would have been  
25 important to you as an implementation specialist during

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1 the fit analysis?

2 A. How many users are there going to be, that  
3 would be a good question right there.

4 Q. Because that would affect --

5 A. But the business analyst is also asking those  
6 same questions.

7 Q. What other kinds of questions would you ask  
8 during the fit analysis?

9 A. Oh, there would be -- like I said, how many  
10 users would be using that one particular aspect of the  
11 program, or explaining to them rights and roles for  
12 configuration, or asking them how many codes need to be  
13 configured.

14 Q. Okay. I'll come back to that. Look at the  
15 document ending at 61. I think it's the third one in.

16 A. Right.

17 Q. This lists a function midway through of  
18 "go-live support."

19 A. Uh-huh.

20 Q. Is that yes?

21 A. Yes, sir. Sorry.

22 Q. And that's another function you performed as an  
23 implementation consultant, correct?

24 A. Yes.

25 Q. Maybe it would be helpful to get just kind of a

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1 A. Yeah.

2 Q. You entered eight hours for being absent for a  
3 holiday?

4 A. Well, we had to count our hours on those  
5 holidays. You had to put it in.

6 Q. Right. That was the instruction given to you?

7 A. Yes.

8 Q. And you also did the same thing for the next  
9 day where you took a day of PTO on Friday?

10 A. Yes, I took a vacation day.

11 Q. And you entered that time as well?

12 A. Yes.

13 Q. And you were told to enter that time as well?

14 A. Yes.

15 Q. Look at the Monday entry down below where it  
16 has the description "prepared and taught class on eFiling  
17 per R. Matkin's request." That's Ryan Matkin?

18 A. Yes.

19 Q. And eFiling is the system by which lawyers file  
20 documents with the courts?

21 A. Yes.

22 Q. And who -- I take it this is internal training.

23 A. Yes.

24 Q. To people at Tyler?

25 A. Well, I did two classes that day -- well, I did

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1 it several days. I did classes not only for Tyler, but I  
2 also did a WebEx for Collin County.

3 Q. That same day?

4 A. I'm not quite sure.

5 Q. So the WebEx for Collin County was a training  
6 session done over the Internet?

7 A. Yes, using WebEx.

8 Q. Right. WebEx is a program?

9 A. Yes. It's like a telephone conference via --  
10 it's like Skype now.

11 Q. Right. So you're putting on a presentation,  
12 and they are looking at the presentation over the  
13 Internet?

14 A. Right.

15 Q. And you're talking over a telephone?

16 A. It's a training. It's just not in person.

17 Q. Did you -- there's a presentation that's on the  
18 computer that's being clicked through as you're talking  
19 though, right?

20 A. Right.

21 Q. Did you put that together?

22 A. Yes.

23 Q. And that was on eFiling?

24 A. Yes.

25 Q. Is that the same presentation that you gave to

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1 the internal folks at Tyler?

2 A. Yes.

3 Q. And were those implementation specialists or  
4 all different groups of employees?

5 A. Mainly implementation.

6 MR. McKEEBY: Let's go off the record for  
7 just a second. Is that okay?

8 MS. BAGLEY: Sure.

9 (Recess.)

10 MR. McKEEBY: Back on the record.

11 Q. I think I'm done with the time sheets, at least  
12 for now. I wanted to ask you something about travel  
13 though. Do you have that -- we talked about a couple of  
14 entries where you had travel on your time sheets, and I  
15 take it that means the trip between your home and the  
16 actual county courthouse, for example, in the Decatur  
17 example that we gave?

18 A. Right.

19 Q. And you drove your own vehicle to that  
20 courthouse typically?

21 A. In most cases I would.

22 Q. Sometimes you would drive someone?

23 A. Or sometimes we would rent a car if it was...

24 Q. Would you rent the car, or would someone else  
25 do that?

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1 A. Yes. And truancy.

2 Q. There's a truancy court?

3 A. Yes.

4 Q. And did you do the implementations for all of  
5 those?

6 A. Uh-huh.

7 Q. Is that yes?

8 A. Yes, sir.

9 Q. I don't need the sir part, just the yes.

10 A. I'm just not doing well with that at all.

11 Q. That's all right. We'll get there.

12 All right. So you did the implementation  
13 for all three of those, and how long did each of them  
14 last? First of all, probate.

15 A. Probate lasted for almost a year.

16 Q. And civil?

17 A. I don't remember when we started civil. Civil  
18 took about six months.

19 Q. And truancy?

20 A. Truancy only took about three or four months.

21 Q. In which one of the implementations did the  
22 hardware problem exist in that you told me about, or did  
23 that apply to all of them?

24 A. Probably almost all them. Yeah, it did apply  
25 to almost all of them in varying degrees.

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1 Q. And because of that time delay, that was an  
2 implementation where the training component was larger  
3 than in other implementations? Is that what you're  
4 explaining?

5 A. Yes. I was just giving you an example.

6 Q. Right. And I just want to make sure I  
7 understand the example.

8 A. Yes.

9 Q. All right. Let's talk about conversion of [redacted]  
10 data. That was one of the elements of the implementation [redacted]  
11 process?

12 A. Yes, sir.

13 Q. Is that something that the implementation [redacted]  
14 specialist is involved in?

15 A. In conversion of data?

16 Q. Yes.

17 A. We don't -- the implementation person is not [redacted]  
18 really converting data as much as they are checking to [redacted]  
19 make sure data has been converted properly.

20 Q. But that's part of the conversion process?

21 A. Yes.

22 Q. Who is doing the actual data conversion, the  
23 programmer?

24 A. Yes. There's another whole department that's  
25 in charge of conversion.

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1 Q. Right, but are those programmers?

2 A. Developers.

3 Q. But those are people with whom you would  
4 coordinate with in the implementation process?

5 A. Well, we don't really have to coordinate with  
6 them. I mean, we have to...

7 Q. Well, what would you do to make sure data has  
8 been converted properly by the developers?

9 A. You -- they're going to pull reports, and  
10 you're going to check the codes.

11 Q. Is this something that's done at the client's,  
12 at the courthouse?

13 A. It can be done at the client's site, but it's  
14 done more often at the office.

15 Q. So what are you reviewing in the report to make  
16 sure that the conversion has been done accurately?

17 A. You're reviewing the data and the codes that  
18 match that data.

19 Q. And that information is conveyed to you in  
20 these reports that you mentioned?

21 A. Yes.

22 Q. How do you know whether or not the codes match  
23 the data?

24 A. Well, that's because you've got a list. You've  
25 already -- for example, when we were talking about on

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1 would depend on the nature of the problem involved?

2 A. Yes.

3 Q. How long -- let's give the Dallas County  
4 example. Did you do the conversion for the -- I'm sorry.

5 Did you do the code mapping for the truancy courts?

6 A. Yes. Dallas is a unique situation in that they  
7 have a giant IT department, absolutely giant, so they do  
8 their own conversion.

9 Q. So did you do any code mapping?

10 A. Yes, but that was with them, alongside them,  
11 because they do their own data conversion. And this was  
12 also uniquely different in that we were -- truancy was  
13 also interfacing with another system through all of the  
14 ISDs, Richardson, Garland, Mesquite, Carrollton and DISD.

15 Q. So in that example of Dallas County, you would  
16 be communicating with the customer about the problems  
17 that you saw during the code mapping process?

18 A. And Tyler, because we had brought in a couple  
19 of people from the office because this was such a unique  
20 situation, so we were all working together.

21 Q. So more than one person was doing the code  
22 mapping?

23 A. Well, Dallas was in charge of code mapping, and  
24 we had brought in two experts from the office to help  
25 them.

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1 Q. But did you do the code mapping in Dallas  
2 County?

3 A. I went through the reports and looked for --  
4 and looked for data that might have been misplaced or  
5 incorrectly entered.

6 Q. Right, which is the process that we just  
7 discussed?

8 A. Uh-huh.

9 Q. Agree?

10 A. Yes, sir.

11 Q. Okay. How is that different from  
12 configuration? How is the conversion process that you  
13 just discussed different from configuration?

14 A. In conversion you're taking their data, this  
15 massive amount of data, and you're converting it into the  
16 Odyssey system. You're taking all these records and  
17 reports, all this stuff, and converting it over.

18 Configuration is like taking a suit and altering it.

19 Q. A suit?

20 A. Uh-huh. It's taking a suit and having it  
21 altered.

22 Q. What was the implementation specialist's role  
23 in the configuration process?

24 A. Well, we would configure the system to fit  
25 their particular needs. In other words, you put in all

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1 the rights and roles. You put in the names of the users.  
2 You put in the types of fees that they've got and the  
3 amount of those fees. You put in the types of  
4 dispositions they have. You put in the types of hearings  
5 they have. You set up their dockets the way they want  
6 them set up.

7 Q. And that's something --

8 A. I could keep going on and on, but that's  
9 configuration.

10 Q. And that's something the implementation  
11 specialist did?

12 A. Yes.

13 Q. And that's you?

14 A. Uh-huh.

15 Q. Is that yes?

16 A. Yes, sir. And --

17 Q. How did you know -- well, go ahead.

18 A. Depending on the county or the sophistication  
19 of the county or how that county wanted to operate, a lot  
20 of times they wanted to do their own configuration and  
21 for you to teach them how.

22 Q. So that's --

23 A. For example, Minnesota, Minnesota is extremely  
24 sophisticated, so, you know. And these are all decisions  
25 made by a project manager, not by an implementation

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1 person.

2 Q. Right, in terms of whether or not they wanted  
3 to do their own configuration?

4 A. Right.

5 Q. But if they did want to do their own  
6 configuration, you would train them how to do that?

7 A. You would help them if you were told to help  
8 them.

9 Q. Is that different from training them as to how  
10 to do configuration?

11 A. Well, you're probably going to sit with them  
12 side by side. It's more one-on-one where training is  
13 more in a classroom environment.

14 Q. Okay. Was the configuration when you did it as  
15 an implementation specialist, was that something done at  
16 the customer's site or at Tyler's offices?

17 A. Both.

18 Q. And when you said put in the rights and roles,  
19 what does that mean?

20 A. Odyssey works on a rights and roles system.  
21 That's how it works. That's how its security is built  
22 upon. In other words, you'll have a clerk over here who  
23 only has access to certain parts of the system, where  
24 over here you have her boss or the head of the office who  
25 has access to every court case, every court file, every

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1 their own Odyssey project manager, you know, who's also  
2 there to make decisions.

3 Q. But you have a dialogue with the customer as  
4 well to tell them different access options?

5 A. Uh-huh.

6 Q. Is that right?

7 A. Yeah. And that's why you're showing them --  
8 that's why you do a fit analysis, so that you can show  
9 them the capability so they can start thinking about what  
10 rights and roles they want to give to their people.

11 Q. Do you make any recommendations based on past  
12 experience as an implementation specialist?

13 MS. BAGBY: Object to the form.

14 A. No, you try not to.

15 Q. Not at all?

16 A. No.

17 Q. Why not?

18 A. Because every county is different, and they  
19 know what they want, and they've got their own culture  
20 and their own thing.

21 Q. What if they asked you?

22 A. You just explain to them that it's -- I'll tell  
23 you how it works, but I'm not going to tell you how you  
24 need to run your office.

25 Q. That's a customer decision ultimately?

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1 A. Right, exactly.

2 Q. When we move to the training element of the  
3 implementation, at that point have these decisions with  
4 respect to configuration and roles and rights already  
5 been made?

6 A. By the time you get to training?

7 Q. Yes.

8 A. Hopefully. You ideally would like for it to  
9 be.

10 Q. But not in every case?

11 A. No, plus it's fluid.

12 Q. And you told me, I think, based on your  
13 previous discussion, that the type of training that you  
14 would provide as an implementation specialist would vary  
15 from project to project?

16 MS. BAGBY: Object to the form.

17 A. You're talking about the training of the users?

18 Q. Yes. Was it always classroom training, for  
19 example?

20 A. Most of the time you're going to have a  
21 classroom environment for the clerks for the general  
22 discussions. With the court admin, you may do  
23 one-on-one.

24 Q. Okay. So you would do both classroom training  
25 and one-on-one training as part of the training element

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1 of implementation?

2 A. Right. And sometimes with judges if they  
3 wanted training. Not all judges wanted training.

4 Q. But sometimes you would train judges?

5 A. One-on-one, right, or in a group.

6 Q. And these classroom training sessions, would  
7 there be questions and dialogue from the users?

8 A. Oh, yes.

9 Q. And would you typically be doing these  
10 trainings on your own?

11 A. Yeah.

12 Q. And would you have a PowerPoint or a  
13 presentation, or would you just be walking through, or  
14 how would you do it?

15 A. Well, they each have a computer, and they each  
16 have Odyssey on their computer, and we also had -- we had  
17 training manuals with screen shots.

18 Q. What does that mean, training manuals with  
19 screen shots? That was part of the presentation?

20 A. Right, that we would hand them.

21 Q. Okay. So these would be handouts?

22 A. Yes.

23 Q. So you would walk them through the process at  
24 that point?

25 A. Right. You would go through whatever -- let's

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1 say we were training on setting up hearings and  
2 documenting hearing results, then you would go through  
3 the whole process on that module.

4 Q. Would you ever encounter mistakes during that  
5 training process?

6 A. You mean mistakes in the system?

7 Q. Yes.

8 A. Yes.

9 Q. What would you have to do in those instances?

10 A. You would note down that you needed -- that  
11 somebody, either you or somebody, needed to go in and  
12 correct it.

13 Q. How would you know there was a mistake in the  
14 system?

15 A. Well, let's say you went in and you did the  
16 drop-down box for hearing times, and you didn't have all  
17 the hearing times in there.

18 Q. And you would know that through a dialogue with  
19 the people in the training session?

20 A. Right.

21 Q. So then you would know to go back to the --  
22 who, the programmer to --

23 A. No. An implementation person can go in and  
24 change that.

25 Q. I see.

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1       A. But you want to make sure before you make any  
2 changes. You don't want to make any changes with  
3 somebody's system. You want to make sure with the powers  
4 that be before you make any changes.

5       Q. So a change might be recommended or you might  
6 be aware of a change that you thought needed to be  
7 implemented as a result of the training, and to do that,  
8 you would go to the project manager, for example, and get  
9 authorization?

10      A. Yeah. I mean, it depended on the project, but  
11 by that time when you're doing the training, you know who  
12 needs to be told on what's going on, but primarily it's  
13 going to be the project manager.

14      Q. And the project manager is the person you would  
15 go to for authorization to make a change to the program?

16      A. Right, right.

17      Q. Which, in my example, might come up during the  
18 course of the training when you realized that there  
19 wasn't some -- a particular code that had been entered  
20 properly?

21      A. Right. And like I said, in those big counties,  
22 they have also got their own Odyssey project manager.

23      Q. That's an actual employee of the county?

24      A. Right. Or on a contract job, you know, and  
25 they're always there.

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1 Q. So you might be reporting that to them?

2 A. Uh-huh.

3 Q. Is that yes?

4 A. And, see, they're also going to be doing  
5 configuration.

6 Q. Got it. All right. What's the role that you  
7 had in the go-live process as an implementation  
8 specialist?

9 A. In the go-live process?

10 Q. Right.

11 A. You have to make sure that everything is --  
12 you're right there, and everything is working the way it  
13 should be working. And a lot of times the clerks have  
14 forgotten what they've been taught, and you have to help  
15 them through a process. You're there to answer  
16 questions, and you're there to -- when problems arise, to  
17 try as calmly as possible to get them resolved as quickly  
18 as possible.

19 Q. And just so we're clear, go-live means when the  
20 Tyler software is actually being used?

21 A. Right. It's been turned on.

22 Q. So in that -- would you characterize that as a  
23 support role as well, a support role in the sense that  
24 you're actually at the facility answering questions that  
25 come up?

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1 A. Yeah, it's a support role.

2 Q. How long does this go-live process typically  
3 take, or does that vary?

4 A. That varies greatly.

5 Q. Depending on what?

6 A. Depending on how well the go-live is going and  
7 what problems you have come into. In truancy we did  
8 great. We had very few problems, and we had a two-day  
9 go-live. I mean, it went great, and we didn't have any  
10 problems after that. Wise County, we were there for two  
11 weeks, and then I went on to another county that third  
12 week and was back the fourth. I mean, they had issues.

13 Q. With the go-live?

14 A. Well, at the go-live.

15 Q. What were the issues that they had?

16 A. Their data and the system that they had  
17 previously used, it just would not convert properly. It  
18 was just lots of technical issues.

19 But I'm just saying typically -- your  
20 question was typically?

21 Q. Yes.

22 A. You ideally would like to go no longer than a  
23 week and a half or two weeks.

24 Q. In the go-live process?

25 A. (Nods head.)

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1 Q. That's all right. Do you have a bachelor's  
2 degree?

3 A. Yes, sir.

4 Q. Where is that from?

5 A. Mississippi State College for Women, Columbus,  
6 Mississippi.

7 Q. What was that specialization in?

8 A. It was a bachelor of science in political  
9 science and history, and I got a secondary education  
10 certification.

11 Q. When did you get your degree?

12 A. 1968.

13 Q. So the degree that you have from SMU, that's  
14 not a master's degree, it's a certificate?

15 A. It's the equivalent now of one, but it's a  
16 certificate.

17 Q. Equivalent to a master's degree?

18 A. Yeah.

19 Q. When did you get that?

20 A. 2003 or '04, somewhere around there.

21 Q. Have you ever done a mediation?

22 A. Oh, yeah, many.

23 Q. I'm sure we could spend some time talking about  
24 that, and that might be more interesting than the way we  
25 have occupied our last three hours.

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1 Ms. Carrington, I just want to thank you  
2 for your professionalism and bearing with me, and I  
3 appreciate you cooperating with us.

4 A. Oh, you're very welcome.

5 MR. McKEEBY: I have no other questions at  
6 this point.

7 THE WITNESS: Well, thank you.

8 MR. McKEEBY: You're welcome.

9 MS. BAGBY: I have a couple of questions  
10 for you, Ms. Carrington.

11 EXAMINATION

12 BY MS. BAGBY:

13 Q. Did your supervisors, either your direct  
14 supervisor or the supervisor over them, have direct  
15 knowledge that you were working more than 40 hours per  
16 week during the time that you were working for Tyler  
17 Technologies?

18 A. Yes. In fact, it's documented on this review.

19 Q. Were your supervisors aware that you were not  
20 recording all of the hours you worked on the time sheets  
21 that have been entered as Exhibit Number 3 in this  
22 deposition?

23 A. Yes.

24 Q. How many hours of overtime do you believe you  
25 averaged per week during the time that you worked for

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1 Tyler Technologies?

2 A. I would conservatively say between 15 and 20  
3 hours a week over.

4 Q. Are there any written instructions on how to  
5 fill out a time sheet with Tyler Technologies?

6 A. I'm sure there probably are, but...

7 Q. Have you ever seen written instructions on how  
8 you're supposed to complete a time sheet?

9 A. If I did, it was a long time ago, and it was  
10 that first week I was hired.

11 Q. What percent of your overall time that you  
12 spent on your job, including overtime hours, what percent  
13 of the time do you believe that you spent putting  
14 together PowerPoint presentations for training sessions?

15 A. Well, we didn't really put together  
16 PowerPoints. We just put together handouts with screen  
17 shots on them.

18 Q. When you say screen shot, what does that mean?

19 A. Well, I would take a screen shot showing them  
20 how to like set a hearing or set a hearing date or  
21 release a bond.

22 Q. Where did the screen shot come from?

23 A. From the Odyssey program.

24 Q. So you would just take a screen shot from the  
25 Odyssey program, print it out, and then show it on the